

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

BREANA SCHENK, as next best friend )  
to Ev M, Em M and El M and the )  
ESTATE OF KELSEY DELYAH )  
SCHENK-MCKEE )

Plaintiffs, )

1:22cv01268-STA-jay

v. )

PAUL A. THOMAS, GIBSON COUNTY )  
SHERIFF; and DANNY LEWIS, Chief )  
Deputy Gibson County Sheriff's )  
Department, and TAMELA DENISE COX, )  
Chief Jailor/Correction officer of the )  
Gibson County Sheriff's Department, and )  
WILLIAM HOLBROOK, Deputy/ )  
Correction Officer, and JAILER PRINCE, )  
JAILER LITTRELL, JAILER HILL, )  
JAILER MORGAN, JAILER )  
STURDIVANT, JAILER WATSON, )  
JAILER GILLES, JAILER MEESE, )  
JAILER MCCARTY, JAILER )  
YARBROUGH, JAILER KEEL )  
JAILER PALMER, JAILER DANCE )  
JAILER ABRAHAM, JAILER MCMINN )  
JAILER BAILEY and GIBSON COUNTY, )  
TENNESSEE )

Defendants. )

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MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

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Defendants Gibson County, Tennessee, Sheriff Paul A. Thomas, Danny Lewis, Tamela Cox, William Holbrook, William Morgan, Robin Meese, Beltha Yarbrough, Cordale Dance, Michael McMinn, Eric Bailey and Brandy Hill by and through counsel of record and without waiving any and all defenses available, hereby move the Court for an extension of time to file a

response to the Complaint of the Plaintiff. Defendants state and show unto the Court as follows:

1. The Complaint in this matter was filed on December 12, 2022. (ECF No. 6).
2. Defendants were purportedly served on or around December 23, 2022
3. Further fact investigation is necessary to file a response to the Plaintiff's Complaint, and Counsel for these Defendants need additional time to investigate the complaints and the allegations of the Plaintiff against these Defendants before a responsive pleading is filed.
4. It is the belief of Counsel for Defendants that no prejudice will result to any party because of this extension, and Counsel for Plaintiff does not object to the present Motion or the relief requested herein.

Based upon the above and the record as a whole, Defendants respectfully request that an extension be granted until February 24, 2023, to file a response to the Complaint.

Respectfully submitted,

PENTECOST, GLENN & TILLY, PLLC

By: s/Nathan D. Tilly  
Nathan D. Tilly (#031318)  
Dylan E. Sutherland (#040648)  
*Attorneys for Defendants Gibson County, TN*  
*Thomas, Lewis, Cox, Holbrook, Morgan,*  
*Meese, Yarbrough, Dance, McMinn, Bailey*  
*And Hill*  
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**CERTIFICATE OF CONSULTATION**

The undersigned communicated with Plaintiff's Counsel, Robert Keeton, III via telephone about this matter and notified him that he would be filing a Motion for Extension of Time to File a Responsive Pleading. In response, Mr. Keeton was agreeable to the request and confirmed that he would not oppose the relief requested.

By: s/Nathan D. Tilly  
Nathan D. Tilly

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document ("Motion for Extension") was served via the United States Postal Service upon the following:

Robert T. Keeton, III  
Keeton Law Offices  
20240 East Main Street  
P.O. Box 647  
Huntingdon, TN 38344

on or before the filing date thereof.

DATE: This the 10<sup>th</sup> day of January, 2023.

By: s/Nathan D. Tilly  
Nathan D. Tilly